

Exhibit A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

KATRINA DAVIS, *on behalf of herself, FLSA
Collective Plaintiffs and the Class,*

Plaintiff,

v.

Case No.: 22-cv-07493

LISA'S FOOD ENTERPRISES, INC.
d/b/a MCDONALD'S,
82 COURT CORP.
d/b/a MCDONALD'S,
420 FULTON CORP.
d/b/a MCDONALD'S,
JOHN DOE RESTAURANTS 1-20, and
ROSARIO IRACI,
Defendants.

OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants LISA'S FOOD ENTERPRISES, INC. d/b/a MCDONALD'S, 82 COURT CORP. d/b/a MCDONALD'S, 420 FULTON CORP. d/b/a MCDONALD'S, JOHN DOE RESTAURANTS 1-20, and ROSARIO IRACI ("Defendants") hereby offer to allow judgment to be taken against them, and in favor of KATRINA DAVIS ("Plaintiff"), in the sum of Twenty-Seven Thousand Dollars and No Cents (\$27,000.00) ("Judgement Amount"), to resolve all of Plaintiff's claims against Defendants.

Payment on the Judgment Amount shall be funded within ten (10) days of Plaintiff's acceptance of this Offer of Judgment. In the event of any late payment, Defendants shall be liable for a late payment penalty of 10%, compounded monthly (or the highest interest rate allowed by law in the Eastern District of New York), accruing automatically on any outstanding balance and no notice from Plaintiff shall be required.

This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and neither this Offer of Judgment nor any judgment that may result from this

Offer of Judgment shall be construed as either an admission of liability on the part of Defendants, or any of them, or that Plaintiff has suffered any damages.

This Offer of Judgment is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure, and shall be deemed withdrawn unless Plaintiff serves written notice of her acceptance within fourteen (14) days of the date on which this Offer of Judgment was served. Any evidence of this Offer of Judgment shall be inadmissible except as provided in Rule 68 of the Federal Rules of Civil Procedure.

Dated: August 7, 2023
New York, New York

KAUFMAN BORGEEST & RYAN LLP



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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2023, I caused Defendants' Offer of Judgment to be served, via electronic mail, upon Plaintiff's counsel of record in this matter:

C.K. Lee, Esq.
Lee Litigation Group, PLLC
148 West 24th Street, 8th Floor
New York, NY 10011
cklee@leelitigation.com

By: _____



Kenneth G. Abeyratne